

**Before The**  
**Federal Communications Commission**  
**Washington, D.C. 20554**

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

ADVANCED TELEVISION SYSTEMS  
 AND THEIR IMPACT UPON THE  
 EXISTING TELEVISION BROADCAST  
 SERVICE

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MM Docket 87-268

To: The Commission

**REPLY COMMENTS OF AK MEDIA GROUP, INC.,  
 REGARDING INTERFERENCE TO KFTY(TV) CAUSED BY THE  
COMMISSION'S PROPOSED DTV TABLE OF ALLOTMENTS**

AK Media Group, Inc. ("AK Media"), licensee of television station KFTY(TV), Santa Rosa, California ("KFTY"), by its attorneys, hereby submits its comments in the above-captioned proceeding. As is clearly demonstrated in the attached Engineering Statement, which is attached hereto and incorporated herein as Exhibit 1, the Commission's proposed draft DTV Table of Allotments will cause KFTY to experience excessive and unacceptable levels of interference within its current service area. Accordingly, as will be more fully explained below, KFTY respectfully requests that the Commission re-allot those DTV channels that are predicted to cause interference to KFTY within the current KFTY(TV) NTSC service area.

KFTY's current NTSC transmission is carried on UHF channel 50 with 302 kilowatts peak visual effective radiated power (ERP) and with an antenna height above average terrain (HAAT) of 939 meters. KFTY also currently holds a construction permit that authorizes it to increase its ERP

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to 398 kW with no change in the antenna site or its HAAT. The Commission, in its Sixth Further Notice of Proposed Rulemaking, issued a draft Table of Allotments which proposed Digital Television (DTV) allotments for all currently authorized NTSC stations. This draft Table of Allotments proposes to allot to KFTY DTV channel 41, and has authorized KFTY to transmit its DTV signal at 50 kW ERP with a 939 meter HAAT.

The Commission's draft DTV Table of Allotments provides figures for new interference caused to stations' existing NTSC service areas by the proposed DTV operations. Although a review of the interference figures indicates that the vast majority of television stations will receive no additional interference, these figures indicate that, if the Commission's current draft DTV Table of Allotments is adopted, 12.1 % of the people currently receiving KFTY's NTSC signal, and 5.9% of KFTY's NTSC service area would be subject to new interference. Clearly this increased interference is not de minimis and is unacceptable to KFTY.

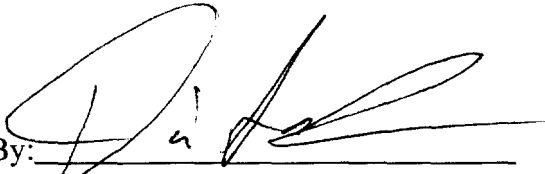
As the attached Engineering Exhibit indicates, the proposed allotments made in the Commission's draft DTV Table of Allotments for KLXV-TV, San Jose, California and KWOK(TV), Novato, California, both of which are substantially short-spaced with respect to the current NTSC operation of KFTY, are major causes of the harmful interference that the Commission's proposed DTV Table of Allotments indicates that KFTY's NTSC signal will experience.

Accordingly, in order to alleviate the increased interference that KFTY will suffer under the Commission's proposed DTV Table of Allotments, AK Media respectfully requests that Commission either change the DTV allotments for television stations KLXV-TV and KWOK(TV) or reduce the ERP and/or antenna height for these stations to the extent that no additional interference will occur in KFTY's current NTSC service area when the DTV Table of Allotments

becomes effective.

Respectfully submitted,

AK MEDIA GROUP, INC.

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Counsel for AK Media Group, Inc.

Dated: January 24, 1997

# **EXHIBIT 1**

ENGINEERING STATEMENT RE  
COMMENTS IN MM DOCKET 87-268  
ON BEHALF OF  
AK MEDIA GROUP, INC.  
KFTY(TV), SANTA ROSA, CALIFORNIA  
NTSC CHANNEL 50 DTV CHANNEL 41  
JANUARY 1997

COHEN, DIPPELL AND EVERIST, P.C.  
CONSULTING ENGINEERS  
RADIO AND TELEVISION  
WASHINGTON, D.C.

COHEN, DIPPELL AND EVERIST, P. C.

City of Washington   )  
  ) ss  
District of Columbia   )

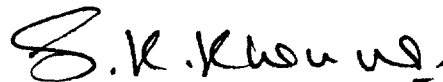
Sudhir K. Khanna, being duly sworn upon his oath, deposes and states:

That he is a graduate electrical engineer, a registered professional engineer in the District of Columbia, and is Secretary-Treasurer of Cohen, Dippell and Everist, P.C., Consulting Engineers, Radio-Television, with offices at 1300 L Street, N.W., Suite 1100, Washington, D.C. 20005;

That his qualifications are a matter of record in the Federal Communications Commission;

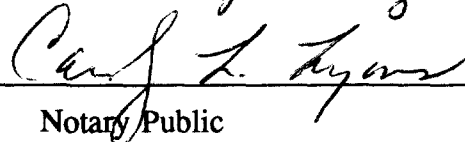
That the attached engineering report was prepared by him or under his supervision and direction; and

That the facts stated herein are true of his own knowledge, except such facts as are stated to be on information and belief, and as to such facts, he believes them to be true.



Sudhir K. Khanna  
District of Columbia  
Professional Engineer  
Registration No. 8057

Subscribed and sworn to before me this 23<sup>rd</sup> day of January, 1997.

  
Notary Public

My Commission Expires:

2/28/98

COHEN, DIPPELL AND EVERIST, P. C.

This engineering statement has been prepared on behalf of AK Media Group, Inc., licensee of TV station KFTY, Santa Rosa, California in support of its comments in response to the Commission's Sixth Further Notice of Proposed Rule Making (FNPRM) in MM Docket 87-268 (*In the Matter of Advanced Television Systems and Their Impact upon the Existing Television Broadcast Service*).

The present NTSC operation of station KFTY(TV) is on UHF channel 50 (686-692 MHZ) with 302 kilowatts peak visual effective radiated power (ERP) and 939 meters antenna height above average terrain (HAAT). The station also holds a construction permit to increase its ERP to 398 kW with no change in the antenna site or its HAAT. In its sixth FNPRM, the Commission has proposed a draft Table of Allotment for the currently authorized NTSC stations for digital television (DTV) operation. The Commission proposes to allot UHF channel 41 for KFTY(TV) and has assigned 50 kW ERP and 939 meters HAAT for its DTV operation.

The Commission's proposed draft DTV Table of Allotments also provides figures for new interference to the existing NTSC service area that would result due to the proposed DTV operations. These figures indicate that station KFTY(TV)'s current NTSC operation would be subjected to new interference within 5.9% area and 12.1% population within its existing service area. Station KFTY(TV) believes new interference caused by the DTV operations to its current service area is excessive and is not acceptable. The Commission should re-allot the DTV channels which are predicted to impact the current KFTY(TV)'s NTSC service area.

A review of the proposed DTV Table of Allotments indicates most of the TV stations are subjected to none or very little new interference to their current NTSC service areas. There are about 1990 NTSC operations which have been allotted a new DTV channel. According to the Commission's calculations, 1964 current NTSC operations out of 1990 stations, are predicted to receive very little or less interference than caused to the NTSC operation of KFTY(TV). In other words, 98.7% of the current NTSC operations would be subjected to less additional interference from the proposed DTV stations than KFTY(TV). Therefore, KFTY(TV) believes it has been treated unfairly by the Commission in its DTV channel allocation process.

Some of the DTV allotments which can impact the current NTSC service area of KFTY(TV) are listed below.

1. KLXV-TV, San Jose, California

Current NTSC channel 65, 3090 kW ERP, 812 meters HAAT

Proposed DTV channel 50, 268 kW ERP, 812 meters HAAT

Actual Distance to KFTY(TV): 186.4 kM

Required Minimum Distance Separation for co-channel: 244.6 kM

2. KWOK(TV), Novato, California

Current NTSC channel 68, 5000 kW ERP, 431 meters HAAT (CP)

Proposed DTV channel 35, 417.2 kW ERP, 431 meters HAAT

Actual Distance to KFTY(TV): 58 kM

Required Minimum-Maximum Distance: 24.1-96.6 kM



Both of these DTV allotments are substantially short-spaced to the current NTSC operation of KFTY(TV) and thus would result in additional harmful interference within its existing service area.

Therefore, station KFTY(TV) requests the Commission to either change the DTV allotments of these TV stations or reduce the ERP and/or antenna height to the extent that no additional interference is caused to its current NTSC service area.